

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Draft
Conditional Major, Operating
Permit: F-08-008 Revision 1
Meritor Heavy Breaking Systems (U.S.A.), Inc.
Franklin, KY 42134
February 16, 2009
Rita Arguello, Reviewer
SOURCE ID: 21-213-00015
AGENCY INTEREST: 3983
ACTIVITY: APE20080001

SOURCE DESCRIPTION:

Meritor Heavy Breaking Systems (U.S.A.), Inc. (Meritor) is an existing source located in Franklin, KY. This facility manufactures heavy vehicle brake systems. The plant consists of three air make-up units, one washing/rinsing unit that contains three baths, four furnaces, two electric arc induction furnaces, a primary and backup pressure pour holding furnaces, a finishing/machining department, a shotblast unit and one paint spray booth.

SIGNIFICANT PERMIT REVISION - F-08-008 R1:

Meritor requested to remove from the recent renewal permit the regulation 401 KAR 63:010 in Section B, for emissions points 07 (220) Transfer to Ladle and 09 (240) Pouring & Cooling and the Operation Limitation Compliance Demonstration, where Meritor shall have taken reasonable precautions to prevent fugitive emissions from becoming airborne.

On Section B, we added monitoring language for the emission points mentioned. We added HAPs and HAPs language to the emissions point 12(-) Shotblast. Also, potentially hazardous matter or toxic substances regulation.

We removed the lead emission limitation from Section D in the existent permit, since Meritor has not demonstrated a feasible method to measure lead emissions. Lead emissions are subject to regulation 401 KAR 53:010, Ambient Air Quality Standards, and 40 CFR Parts 50, 51, 53 and 58, National Ambient Air Quality Standards (NAAQS) for lead which will be updated in January, 2009. Also, we added language for the Housekeeping of Melt/Foundry Operation in this Section.

Regulations that apply are: 40 CFR 63 Subpart ZZZZZ, National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources, 401 KAR 59:010, New process operations, 401 KAR 63:021, Existing sources emitting toxic air pollutants and 401 KAR 63:020, Potentially hazardous matter or toxic substances. Emission factors have been taken from AP 42.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.